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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MARGARET ROSE CURRY,

Plaintiff,

v.

KILOLO KIJAKAZI¹,
COMMISSIONER OF SOCIAL SECURITY,

Defendant.

)
)
) CASE NO. 2:21-cv-00555
)
) **SECOND**
) **CONSENT MOTION**
) **FOR EXTENSION OF TIME TO FILE**
) **PLAINTIFF'S BRIEF**
)
)
)
)

Plaintiff by their attorney, moves for a 60 Days extension of time to file Plaintiff's Opening Brief. Plaintiff's opening brief is currently due to be filed March 14, 2022. Due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met by Plaintiff's Counsel. Wherefore, Plaintiff requests an extension from March 14, 2022 up to and including May 13, 2022 to file their brief. Counsel for the Plaintiff has conferred with Defendant's Counsel who kindly consents to this request.

Dated March 4, 2022.

¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on 7/9/2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted for Andrew Saul as the Defendant in this suit.

1 IT IS SO ORDERED.

2 Dated: March 4, 2022

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UNITED STATES MAGISTRATE JUDGE

Respectfully submitted,

/s/ Hal Taylor

Hal Taylor, Esq.

Of Counsel, Olinsky Law Group

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8 **Plaintiff's Certificate of Service:**

9 I certify that I caused the Second Motion for Extension of Time to be served today,
10 March 4, 2022, by CMECF to Michonne Omo who are filing users of the CM/ECF system.
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12 /s/ Hal Taylor

13 Hal Taylor

14 Attorney for Plaintiff
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